

CONTRACTOR H&S REQUIREMENTS

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Introduction

Emirates Steel believes that all injuries; occupational illnesses; and environmental incidents are preventable. Emirates Steel is committed to relentlessly pursuing a goal of zero harm, both for their own staff, and the staff of the Contractor/Sub-Contractor companies with which they engage. Where reference is made within this document to Contractors, this reference shall be read and construed as extending to all sub-contractors.

Emirates Steel has implemented a set of HSE Principles and Life Saving Rules which are applicable to all personnel wishing to enter ES premises; compliance is mandatory (all ES personnel along with Contractors [and their subcontractors]). All Contractor employees assigned to work on activities at Emirates Steel will be familiarized via this document but also, prior to mobilization from Emirates Steel at the H&S Induction Training. Violation of a Life Saving Rule will subject the violator to serious disciplinary action.

Emirates Steel expects all their Contractors to comply, at the very least, with the H&S requirements detailed in this document during the course of their work.

The scope of this document applies to Contractors providing a physical service (or combined material & service) to Emirates Steel operations, projects and facilities management under a fixed contract agreement. These services include, but are not restricted to, plant and facilities maintenance, modification and installation activity, capital projects related activity, manpower supply, etc.

These requirements include, and/or make reference to all Emirates Steel H&S Rules, Procedures, Standards and Safe Work Practices to be applied when undertaking activities within our premises. They shall be read in conjunction with the UAE applicable laws and regulations as well as the contractual obligations of the Contract and may be changed to suit a particular task or the needs of any Emirates Steel department.

For any clarification or additional information please contact the Emirates Steel H&S Department.

REQUIREMENTS

1. Site Supervision Resources (when not working under ES direct supervision)

Under no circumstance shall Contractor employees be permitted to work without adequate supervision. Contractors shall designate and identify qualified and experienced Supervisors/Foremen capable of communication in English, min 5 years of site experience, competent in providing leadership in H&S management of their teams, as well as in the technical Scope of Work.

Additive to Section 2 below, prior to any Contractor employee entering site, Emirates Steel shall provide general H&S Induction Training and comprehension test in a limited number of languages; however, it is the Contractor's responsibility to ensure that all their employees (who may exhibit a range of language and literacy capabilities) fully absorb, understand and act upon any H&S training, information, instructions, and conversations related to contract execution throughout the duration of the engagement (by utilising, for instance, multi-lingual supervision and visual demonstration techniques).

1.1. The supervisor/foreman main Health and Safety responsibilities (Ref. Abu Dhabi EHSMS):

- Ensure that all hazard and risks are identified and controlled to an acceptable level prior to start any task.
- Participate and prepare the risk assessment.
- Provide H & S information and training to their staff.
- Ensure the on-site team have the required tools and PPE to safely complete the assigned task.
- Perform daily safety activities including, but not necessarily limited to tool box talks with the workers, receipt of permit to work and compliance with Emirates Steel site safety rules

- Report hazards, near misses, accidents and any other HSE non-conformity noticed on site.
- Prepare accident investigation for Emirates Steel and update Emirates Steel HSD on their staff medical status when required. Investigations should be completed with the defined time frame.
- Be familiar with the site emergency procedure and take ownership for the staff during any emergency.

2. H&S File

Pre-mobilisation, or on reasonable request, the Contractor shall provide Emirates Steel with an H&S file which will be kept by Emirates Steel H&S Dept. who will act as custodian. The Contractor shall be held accountable for ensuring that the File is continuously updated with the latest versions of the documents contained therein. The File shall include (*non-exhaustive list*):

- H&S Plan for the project or set of contracted activities
- Medical certificates of fitness for work, and copies of I.D's, for the work team
- Insurance Liability
- Training Records and Matrix
- Competency certificates
- Records of appointment of responsible people e.g. Supervisors
- Organogram with Emergency Contact numbers
- JSAs and JMSs
- MSDS
- Tool check list
- Certificates of condition/testing (e.g. lifting equipment/ tools etc.).
- Electrical powered tools list (list reviewed and approved by Emirates Steel)
- Harness; lifting tools; tackles; general lifting equipment; SCBA hydrotest, and rigger, operator, scaffolder and scaffolding inspector third party certificates
- Incident Investigation procedure and records
- Waste disposal plan
- H&S records / statistics.

3. Induction

Contractors shall receive Emirates Steel H&S induction training prior to entering the working premises (HSD-PR-009). This can be organised through submitting a request to safetyinduction@emiratessteel.com. At the end of the induction training, a short test of comprehension will be given. Emirates Steel reserves the right to refuse entry to any Emirates Steel work site for any Contractor personnel) that have either not satisfactorily completed the H&S induction training as described above or have failed the training comprehension test.

4. H&S Manpower Resources

The appointment of H&S Managers / Supervisors / Officers does not relinquish the responsibilities towards health and safety of Contractors top management, supervisors and employees under the Abu Dhabi Occupational Health Safety System Framework, (OSHAD-SF). The appointment is part of the strategy to assist all parties in complying with their duty of care. The responsibilities of the H&S Managers / Supervisors / Officers include, but are not necessarily limited to:

- Leadership of the development, implementation and maintenance of an appropriate H&S Management System with the entity.
- Provision of specialist advice and support to senior management regarding how to control the workplace hazards and risks.
- Ensuring the H&S performance monitoring system to be in place to ensure the effectiveness of injury prevention and risk management procedures.
- Ensuring two-way communication between HSD, the management and the workforce.
- Ensuring that H&S programs are in compliance with the regulatory requirements.
- Advising the Contractor senior management regarding legal H & S requirement for compliance.

- Ensure that applicable H&S programs are in compliance with the regulatory requirements.
- Advise the senior management regarding legal H & S requirement for compliance.
- Evaluate the H&S performance of any selected sub-contractor for the selection process and assessment criteria.

The Contractor shall allocate adequate and qualified H&S manpower resources (Ref. Abu Dhabi EHSMS) to meet the following minimum requirements:

Number of Permanent Site Staff	Minimum HSE Manpower	Minimum Requirements of competency
10 – 50 staff	1 Safety Officers / Supervisor Permanent on Site	Minimum of 3 to 5 years of experience holding at least IOSH Managing Safely Qualification or OSHA 30 Hours Training Course. They shall be trained / experienced in chemical handling, basic firefighting, and confined space entry, risk assessment, working at height and basic road safety. They should be able to communicate in spoken and written English, hence capable of writing simple reports such as conducting safety inductions, safety meetings with the clients and with the employees performing day to day Tool Box talks.
Above 50 Staff	1 Safety Manager Permanently Based on Site 1 First Aid responder	Minimum of 5 years and above of experience, holding at least NEBOSH International General Certificate or any other qualification equivalent to level 3 of the HSE qualification framework. They shall be trained/experienced in emergency response, firefighting, and lifting, chemical handling, permit to work system, advanced confined space entry, gas testing and advanced risk assessment. Able to communicate well in spoken and written English as well as being capable of writing detailed reports, including accident investigation reports, safety procedures, minutes of meeting, circulars and official communications to the client. Previous experience in the Gulf Region is a plus. Contractors shall include a first aid responder in their team, if the number of their employees (including sub-contractors) is equal to, or exceeds, 50 staff on site

5. Reporting and Investigation

Contractor employees shall immediately report any incidents, accidents, injuries, near miss, any hazard observed and damage to property to the Emirates Steel Process Owner / Area Supervisor / Contract Focal Point. Contractors should actively encourage all their employees to report Near Miss, Hazard Observations, without fear of consequence.

The Contractor shall participate in incident investigations conducted by Emirates Steel when required.

6. Employee Welfare

Contractor personnel must be able to perform their job duties in a safe, secure, productive and effective manner and remain able to do so through the entire time they are working. The Contractor shall have a fitness for duty policy, which ensures their personnel do not perform work under circumstances of 'diminished capacity' – i.e. they must be physically and emotionally capable of performing the work to which they are assigned. In addition to reporting all work-related injuries, the Contractor must ensure that its employees report non-work-related injuries or conditions to their supervision to the extent that they risk aggravating a pre-existing condition or affect ability to safely perform the work. Additionally, the Contractor should have a "restricted work" policy to minimize risk of injury aggravation.

For reference, diminished capacity exists when a worker's ability to safely perform their duties are compromised due to (but not limited to):

- fatigue Management
- working hours exceeding local employment standards
- off-the-job accommodation and recreational standards fall below local regulatory and inspectorate requirements
- substance abuse (includes over-the-counter drugs, misuse of prescription drugs and illegal drug use and alcohol consumption)
- supervision lacks training to recognize symptoms and behaviors common to abuse and take action to address substance abuse through the employer.
- medical – pre-existing conditions, prescription drug use or allergies creating negative effect on a worker’s ability to work safely
- physical limitation - interaction with the environment conditions like heat, climbing, lifting, pre-existing injuries
- psychological – work related and non-work-related mental distractions or stresses like family matters, difficult life experiences, co-worker problems, phobias

Contractors shall ensure that, during hot weather, their employees shall be limited to heat exposure by management of their schedule, nature of work, rest regimes, provision of shades / cool areas, hydration, etc.

Contractors personnel shall be provided with the required welfare facilities. Depending on the contractual agreement Emirates Steel or the Contractor shall look after such provision.

All temporary buildings of Contractors within Emirates Steel worksites shall be located in an area approved by Emirates Steel User Department. These temporary caravans or cabins need to meet civil defense standard for the working people occupation.

7. Emergency Preparedness

The Contractor shall abide by the Emirates Steel Emergency Procedure which is highlighted as part of the induction.

Emirates Steel fire and emergency response equipment and systems shall not be impaired or used for non-emergency activity without authorisation from Health and Safety department.

All Contractors shall ensure that they have knowledge of the name and location of their workers and of the emergency assembly points so that they can be accounted for during any arising emergency situations.

8. Control of Work

Contractors shall ensure they eliminate or control workplace hazards as far as possible and take satisfactory measures to reduce risk to an acceptable level where the risk of injury or damage is unlikely. In the scenario where a Contractor is unclear on how to mitigate risk, they should seek support from the Emirates Steel End User or H&S Departments.

1.2. Scope of Work

Emirates Steel shall provide the Contractor with a Scope of Work at Invitation to Bid stage, which shall include full and clear declaration of:

- Description and specifications of the work/activity required of the Contractor
- Safety performance expectations and behaviors required of the Contractors to be engaged.
- Specific risks, hazards, and risk mitigation requirements (Safety Plans, Job Safety Analyses (JSAs), Job Method Statements (JMSs), etc. to be submitted by the Contractor) associated with execution of the required service
- Specific competencies, experience and skills (as appropriate) required from the Contractor personnel to be engaged

1.3. H&S Plans

Based on the above Scope of Work, and a subsequent visit to the proposed Emirates Steel worksite, Contractors shall include an H&S Plan for execution of the required work in their bid submission. Emirates Steel will review the H&S Plan integral with their Bid Evaluation and Contractor Selection processes.

1.4. Permits to Work (PTW)

All physical routine and non-routine work/activity to be carried out by all Contractors engaged by Emirates Steel shall be subject to the control processes detailed in the Emirates Steel Permit to Work Procedure (HSD-GR-PR-003). It is very important for the Contractor to take into consideration that the overall Permit to Work Procedure provides for the following risk-specific types of Permits:

- Cold Work Permit (HSD-GR-FM-001)
- Confined Space Entry Work Permit (HSD-GR-FM-002)
- Hot Work Permit (HSD-GR-FM-003)
- Excavation Work Permit (HSD-GR-FM-053)
- Permit to Work on Live or Energized Equipment (HSD-GR-FM-093)

Contractors shall fully familiarize themselves appropriately with all these procedures, together with their related requirements, including the associated Contractor-related accountabilities and responsibilities.

9. PPE

Contractors shall use PPE as a last line of defense where the workplace hazards cannot be eliminated or reduced to an acceptable level.

Contractor personnel working at Emirates Steel worksites shall comply with all applicable PPE requirements for the task they are performing or the area in which they will work. The minimum required PPE within Emirates Steel is Safety Helmet, Safety Boots and Safety Glasses. Contractor personnel needing to wear spectacles for their work will be required to wear prescription safety glasses whenever they work at Emirates Steel. The Contractor management must ensure that those Contractor personnel are provided with prescription safety glasses in order to access Emirates Steel plant or work areas.

Other PPE may be required dependent on the task being performed. Contractor employees will wear an overall or long trousers with long sleeve shirt/ jacket, all compliant with BS EN ISO Standard 013688. These items of clothing shall be Flame Resistant, unless otherwise advised. Loose clothing shall not be worn, and long hair shall be tied back when work is performed around machinery with exposed moving parts. Loose clothing worn around the neck area is forbidden.

Contractor's provision of PPE should be relevant to the task they are assigned to carry out, offering protection against the hazards present. All PPE worn by Contractors and Sub-Contractors personnel shall be subject to inspection by Emirates Steel End User and H&S Departments, and must meet the requirements of Emirates Steel PPE procedures.

Contractor's personnel not adhering to the PPE rules shall be removed from site and not allowed re-entry until the next day, pending confirmation of future compliance.

10. Life Saving Rules

Emirates Steel has implemented a set of Life Saving Rules which shall be complied with by all personnel (including Contractors).

All Contractor and Sub-Contractor employees assigned to work on activities at Emirates Steel must receive familiarisation training on these rules prior to mobilization, firstly from their own company management, and secondly Emirates Steel shall include an awareness summary of their Life Saving Rules in the H&S Induction Training which they will provide immediately prior to Contractor and Sub-Contractor employees initially coming on site.

Emirates Steel expect strict compliance. Violation of a Life Saving Rule will subject the violator to serious disciplinary action, unless there are extremely exceptional/extraordinary circumstances.

11. Plant and Equipment

All plant and equipment brought to the site shall be in good condition and safe to use. Contractors shall develop and maintain necessary checklists, highlighting the vital points for equipment inspection and the frequency of that inspection (daily/weekly/monthly).

Damaged tools and equipment shall be immediately removed from the worksite and be repaired or replaced. Tools shall be used only for the purpose for which they were designated. No home-made or altered tools shall be used; tools at all times should be fit for purpose.

Contractor employees driving vehicles shall be required to have a valid UAE Driving License for the class of vehicle being driven; each vehicle shall have a valid registration.

All vehicles brought by the Contractor shall conform to UAE Traffic law regarding roadworthiness, licensing, insurance, spares, and safety equipment.

- Mobile Lifting Equipment (such as forklifts, cranes, man-lift, shovel, etc) shall only be operated by qualified and certified personnel.
- Forklift Trucks have to be equipped with a safety warning system (beacon light, red arc light, blue beam light and seat belt indicator)
- Contractors driving vehicles shall comply with all posted traffic signs, maintaining speed, signals and directions.
- Vehicles / Equipment shall not block any street, roadway, emergency vehicle, or emergency exit.
- Speed limit for all vehicles is 20 kph.
- Seatbelts must be worn at all times.
- No person is permitted to ride on or in any vehicle unless there is a specific seat for him.
- The use of a mobile phone while driving or operating equipment is prohibited

12. Portable Power Tools

Contractors shall ensure that portable electrical tools and measuring instruments have valid calibration certificates and are maintained in a good condition. All electrical tools shall be physically inspected for condition and integrity prior to use at the worksite. Electrical tools shall be periodically inspected and PAT tested, and records of these inspections shall be maintained.

The Contractor shall retain the services of a competent qualified electrician to inspect and tag electrical power hand tools, transformers, distribution boards, extension cables etc.

All electrical leads must be connected to the power source through standard industrial waterproofed plugs and sockets (Industrial Type), which shall be in good condition.

If any defects are identified, the tool shall be removed from service, tagged (not to be used).

Portable electrical tools shall only be operated by the personnel who have the necessary knowledge, experience and skill to operate them safely.

When using portable electrical tools on small work pieces inside a workshop, the work pieces shall be suitably secured to the workbench using a vice or clamps and the working surface should be clean and dry.

Double insulated tools shall be used

Power tools and associated implements, shall be used only for the specific purpose they were designed. (Do not improvise with the wrong tools or handmade power tools).

The use of tools with powered machines such as lathes or grinders shall be strictly controlled. A competent person shall be assessed by their supervisor prior to use of the power tool, and this shall take place accompanied with further training to ensure capability of the “competent” person to perform this job safely as per Manufacturer Guidelines, Method statement and Risk Assessment.

Power tools, such as Grinding machines, have to be fitted with “**Dead man switch**” trigger (auto cut off).

Tools shall always be transported from one work location to another (when required), in adequate containers and in such a way as not to endanger the safety of other personnel available in the area.

Sharp-edged and sharp-pointed power tools shall not be handled as follows:

- Thrown from person to person.
- Be used in close proximity to others (e.g. a slip of the tool may injure someone not involved in the task).
- Be used in close proximity to moving machinery without proper precautions being considered.
- Not be left lying around where personnel have to pass (especially on elevated work platforms where they might fall on persons below).
- Only insulated or non-conductive tools shall be used on or near live electrical equipment, where there is a risk of electrical shock. Storage of Power tools.

Prior to storage, power tools shall be electrically de-energized, switched on the safe mode, and packed safely according to manufacturer instructions.

Sharp power tools shall be stored with their blades/edges protected or be placed in a safe position to avoid accidental contact or falling onto personnel.

Power Tools shall be kept clean and free from moisture and chemicals, and where necessary, lightly oiled to prevent damage and corrosion.

Prior to storing, power tools shall be regularly inspected for defects and where necessary, repaired or disposed of. Only safe and good condition tools shall be stored for future use.

13. Working at Height

When it is necessary for Contractor/Sub-Contractor employees (or anybody else) to work at a height of 2m or above, fall protection equipment in locations not equipped with guardrail shall be worn. All work of this nature shall be compliant with the Emirates Steel Working at Height Procedure. Where fall protection equipment is worn the contractor shall provide sufficient resources for rescue and a rescue plan. Where training is provided for safe working at height, the training shall cover as a minimum;

- Types of fall protection equipment
- Fall hazards associated with the work to be completed
- Procedures for the removal of fall protection devices from service for repair or replacement
- Fall protection equipment identification methods
- Equipment maintenance and inspection requirements
- Emergency rescue procedures
- Practical and theoretical training on the actions to be taken in an emergency including rescue from height
- Suspension trauma
- Equipment strengths and weight limitations

The provision of rescue equipment, rescue plans and resources is mandatory.

Where scaffolds are required for work access, Contractors will not erect a scaffold unless they are qualified and have received a permit to do so. All scaffolds will be tagged showing the date of erection and they will be inspected (by a certified, competent Inspector) every 7 days.

Any scaffold without a tag or one showing a red tag shall not be used until inspected and deemed safe by the competent person.

Mobile scaffold towers may only be erected by trained and competent persons ensuring that all necessary guardrails/hand rails and out riggers/stabilizers are fitted.

Contractors shall ensure that the use of ladders as working platforms shall be avoided, as far as is reasonably practical. When ladders are required for access purposes, they shall be ANSI rated for the required usage. Contractors shall ensure that these ladders are periodically inspected for condition, and records of these inspections shall be maintained.

14. Lifting Activities

The Contractor shall ensure that all lifting tackle, lifting appliances, mobile work platforms and hoists under his control have current, up-to-date certification to British Standard Specification or equivalent. Prior to their use on Emirates Steel premises the Contractor shall provide copies of test certificates to the End User Department.

No person (Contractor or Sub-Contractor or anybody else) shall be permitted to operate a lifting device (material or personnel) unless they have been properly trained. Documentation of the training shall be furnished to Emirates Steel upon request. Each operator shall carry on his/her person, certification that validates their ability to operate the lifting device being operated.

15. Confined Space Working

Contractors wishing to enter a confined space shall only do so under the direction of an authorised Emirates Steel person. In all cases a permit will be required.

All contractor persons (including Emirates Steel personnel) must have received training in confined space. This training must have included as a minimum:

- Principles of Confined Space Hazards
- Awareness of Confined Space Risk Assessments
- Principles of a Permit to Work System
- Use equipment and tools safely and in accordance with manufacturers' instructions.
- Understand and demonstrate the duties of the Safety Attendant.
- Understanding of the principles of Confined Space Communications (methods, types and limitations).
- Understanding of the Principles and Procedures for Atmospheric Monitoring.
- Understanding the principles of Ventilation (methods, types, limitations).
- Prepare and use emergency escape breathing apparatus in accordance with manufacturers' specifications.
- Follow procedures and work safely.
- Prepare to enter, work and exit a Confined Space safely.
- Principles of Confined Space Hygiene.
-

Demonstrate an understanding of Confined Space Emergencies and how to deal with them. Training can be provided by a competent trainer and could be in-house. If you are using one of your employees for this, the trainer should have the 'train the trainer' certification to ensure they are up to date on best practices. They shall be qualified in confined spaces rescue and the trainer must be approved by Emirates Steel health and Safety department.

If you don't have the skills or resources to train your employees internally, you may need to use an external training provider.

evidence of the confined spaces training provided including certificates must be produced from a third-party training provider or from an internal competent trainer.

The contractor is responsible for the provision of all emergency resources including rescue personnel, rescue equipment and rescue plans.

16. Rescue Plan arrangement:

Contractors must develop a rescue plan for all the relevant activities they are involved in such as Confined Spaces, Work at heights and other related activities as identified in the risk assessment.

- Submit the appropriate Rescue plans along with the JSA and Method statement for Emirate steel H&S representatives verification and agreement at least 48 hours prior to the work commencing on site
- Before developing a Rescue plan, contractors' team must visit the confined space location and carryout a risk assessment in order to identify the resources required in order to produce a suitable and sufficient safe system of work including a rescue plan and to specify appropriate rescue equipment.
- Contractors may request ES EIT team for expert rescue advice in advance.
- It is the contractor's responsibility to make sure all the required resources are deployed and implemented accordingly.

17. Housekeeping

Contractors shall at all times keep the job site (and adjoining premises, driveways, and walkways) clean and free from accumulated debris, trash and rubbish.

At the conclusion of the job, Contractor shall be responsible for removing all remaining materials, supplies, trash and leave the area safe, clean and ready for use. All the waste materials generated from the work need to be disposed as per the disposal procedure applicable. The hazardous waste material to be separated and to be discussed with ES in charge person for disposal procedure.

Contractor employees are not allowed to interfere with any material or tools in the plant area, where it may affect the running plant or machinery. All Contractor employees to be briefed about the house keeping rules applicable.

18. Smoking

Smoking is only permitted in designated places and per ES policies and procedures.
Smoking is not allowed in vehicles and cabins.

19. General

Horseplay, fighting, gambling, possessions of firearms or explosives, use of regulated drugs, or alcohol, being under the influence of drugs or alcohol, theft, vandalism, sabotage, and distribution of unauthorised literature shall not be permitted. Those involved in such activities shall be removed from the worksite and shall be liable for punishment by any applicable law.

20. Contractor-Related H&S Meetings and Performance Management

Contractors shall attend all H&S Performance Review meetings with Emirates Steel upon invitation. These will be on 3 levels:

- a) Regular activity-specific and Contractor/contract-specific H&S Performance Management Meetings held between the Emirates Steel End User Dept. and the Contractors engaged on the activities/contract in question.
- b) Monthly, site-wide Contractor H&S Review Meetings shall be held between Emirates Steel and representatives of Contractor companies currently engaged.
- c) Bi-annual Contractor Safety Management Board meetings shall be held between Executive-level representatives of Emirates Steel and the Contractor companies currently engaged.

Contractors shall have an expectation that Emirates Steel will deploy a number of Contractor H&S Performance Monitoring tools and processes during execution of contracted activities, such as:

- Safety Observations
- Safety Inspections
- Permit to Work Audits
- H&S Audits

These are positive and inclusive management and monitoring tools aimed at continuously improving Contractor H&S performance and behavior.

All Contractor and Sub-Contractor employees shall be expected and encouraged to participate in the Emirates Steel Safety Observation program, which is open to everyone on an Emirates Steel site. Everyone on site is empowered to observe and interact positively with personnel, identifying safe and unsafe behavior and conditions, triggering improvement action if appropriate.

If the Contractors have the responsibility to close-out any improvement action items arising from the various H&S meetings, audits and observations, they shall do so as per the agreed timeline. In exceptional cases where Contractors are not able to attend H&S meetings, and close out associated action items in timely fashion, the Contractors shall update their Emirates Steel focal point and Emirates Steel H&S Dept. in writing in advance.

Contractors shall also regularly hold their own H&S Performance Review Meetings based on set KPIs and their H&S Plans.

Each Contractor shall have dedicated H&S Officers, approved by Emirates Steel, assigned to their site teams – one per 20 Contractor employees. The Contractor H&S officers shall ensure that their H&S Files, under the custodianship of Emirates Steel H&S Dept. are continuously updated with records and documentation which is current, as long as the contractor has a contract with Emirates Steel. Refer to the attached appendix for more detailed information.

Contractors shall have the expectation that Emirates Steel may request to conduct a Facilities H&S Inspection of the Contractor's local base camp, external to Emirates Steel, at any time. This third-party inspection is deployed in the spirit of assisting with, and supplementing, Contractors own H&S performance improvement programs.

Contractors shall be required to submit Contractor H&S Performance reports/statistics to Emirates Steel H&S Department, completed on a monthly basis.

21. Disciplinary

In cases where there has been a breach of the safety rules and these requirements; Emirates Steel may apply Emirates Steel policies and procedures and the relevant laws including but not limited to the "Disciplinary Rules" provided in Chapter VI of the Law UAE Federal Labour Law no. 8 of 1980. This entitles Emirates Steel to take any of the following actions against its employees and or where applicable, the Contractors depending on the severity of the breach. In serious cases involving Contractor's personnel Emirates Steel may take action directly against the concerned Contractor or request that the Contractor employer takes the necessary action against his own employee(s):

- Warning (verbal or written).
- Fine (individual or company).
- Suspension from work with reduced pay for a period not to exceed 10 days.
- Denial or deferment of periodical allowance.
- Denial of promotion.
- Dismissal without prejudice to severance pay.
- Dismissal with denial of all or part of the severance pay. This penalty may not be imposed for reasons other than those exclusively specified in Article 120.

"Article 120 of the UAE Federal Labour Law No. 8 of 1980" shall be applied, which stipulates: "If the worker disobeys instructions respecting industrial safety or the safety of the workplace, on condition that such instructions are in writing and have been posted up at a conspicuous place and, in the case of an illiterate worker, that he has been acquainted with them orally".



Emirates Steel and all of its employees thank you in advance for your adherence to these rules and in helping to maintain and improve the overall H&S Awareness and Performance on our premises.

Anna Petrachkova
Health and Safety Manager

26.08.2020
Date

Saeed Al Ghafri
Chief Supply Chain & Planning Officer

30 August 2020
Date